

**RICHARD J. MA, ESQ.**

20 Vesey Street, Suite 400  
 New York, New York 10007  
 Tel. (212) 431-6938  
 Fax. (212) 964-2926  
 E-mail: [richardma@maparklaw.com](mailto:richardma@maparklaw.com)

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**Via ECF and E-Mail**

Honorable Kimba M. Wood  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

MEMO ENDORSED

Re: *United States v. Marcello Sansone*  
 20 Cr. 605 (KMW)

Dear Judge Wood:

As Your Honor is aware, I am counsel to Mr. Marcello Sansone in the above-referenced matter, appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. §3006A. This correspondence is to respectfully request temporary modification of Mr. Sansone's bail conditions to permit him to travel to Orlando, Florida, located in the Middle District of Florida.

Your Honor will recall that Mr. Sansone has been at liberty on the following agreed-upon bail package: (i) a \$100,000 PRB; (ii) co-signed by three FRP's; (iii) Pretrial services as directed; (iv) travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey; (v) the surrender of travel documents with no new applications; (vi) no contact with the co-defendant unless accompanied by counsel; (vii) drug testing and mental health treatment as directed by Pretrial services; (viii) obtain and maintain employment as approved by Pretrial Services; and (ix) no use of controlled substances unless with a prescription. Mr. Sansone has complied with all conditions of his bail and he continues to be in constant contact with counsel and Pretrial Services.

This application seeks modification of Mr. Sansone's above-stated bail conditions, permitting him to travel to and from Orlando, Florida from June 16 through June 23, 2021. We request the modification so that Mr. Sansone may attend his fiancé's uncle's

Granted  
 KMW

seventy-fifth birthday party. If the travel is permitted, Mr. Sansone intends to travel with his fiancée and his fiancée's grandmother by car to Orlando, Florida, and will stay with his fiancée's relatives, which contact information will be provided to Pretrial Services. Finally, upon Mr. Sansone's return, the bail conditions currently in place will be immediately reinstated in full force and effect.

Based upon my communications with AUSA Daniel G. Nessim and PTS Officers Lea Harmon and Elizabeth Charleston, neither the government or Pretrial Services object to this request.

Therefore, for the reasons stated herein, we respectfully request that the Court grant this application for temporary modification of Mr. Sansone's bail conditions.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc via email: A.U.S.A. Daniel G. Nessim  
Marcello Sansone

SO ORDERED: N.Y., N.Y.

5/18/21

*Kimba M. Wood*

KIMBA M. WOOD  
U.S.D.J.